

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

: INFORMATION  
: 21 Cr. 00646-KMK

- v. -

:  
CHRISTOPHER NUNEZ,

:  
Defendant.

- - - - -x

COUNT ONE

(Coercion and Enticement)

The United States Attorney charges:

1. From in or about early March 2021 up to and including on or about May 1, 2021, in the Southern District of New York and elsewhere, CHRISTOPHER NUNEZ, the defendant, using facilities and means of interstate and foreign commerce, knowingly persuaded, induced, enticed and coerced an individual who had not attained the age of 18 years to engage in sexual activity for which a person can be charged, to wit, CHRISTOPHER NUNEZ, the defendant, in communications online, persuaded, induced, enticed and coerced a 15-year-old minor ("Victim-1") to meet NUNEZ in person in Westchester County, New York to engage in sexual activities with NUNEZ.

(Title 18, United States Code, Sections 2422(b).)

COUNT TWO

(Coercion and Enticement)

The United States Attorney further charges:

2. From on or about January 1, 2021 up to and including on or about March 6, 2021, in the Eastern District of Kentucky and elsewhere, CHRISTOPHER NUNEZ, the defendant, using facilities and means of interstate and foreign commerce, knowingly persuaded, induced, enticed and coerced an individual who had not attained the age of 18 years to engage in sexual activity for which a person can be charged, to wit, CHRISTOPHER NUNEZ, the defendant, in communications online, persuaded, induced, enticed and coerced a 12-year-old minor ("Victim-2") to meet NUNEZ in person in Laurel County, Kentucky to engage in sexual activities with NUNEZ.

(Title 18, United States Code, Sections 2422(b).)

COUNT THREE

(Sexual Exploitation of a Child)

The United States Attorney further charges:

3. From in or about January 1, 2021 up to and including on or about March 6, 2021, in the Eastern District of Kentucky and elsewhere, CHRISTOPHER NUNEZ, the defendant, knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and the defendant knew and had reason

to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in or affecting interstate and foreign commerce and mailed, and such visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, to wit, CHRISTOPHER NUNEZ, the defendant, while in Miami, Florida, communicated online with Victim-2, a 12-year-old girl in Laurel County, Kentucky, and persuaded Victim-2 to take and transmit sexually explicit photographs and videos of Victim-2 to NUNEZ, the defendant.

(Title 18, United States Code, Section 2251(a) and (e).)

COUNT FOUR

(Coercion and Enticement)

The United States Attorney further charges:

4. From in or about May 2021 up to and including in or about June 2021, in the District of Jersey and elsewhere, CHRISTOPHER NUNEZ, the defendant, using facilities and means of interstate and foreign commerce, knowingly persuaded, induced, enticed and coerced an individual who had not attained the age of 18 years to engage in sexual activity for which a person can

be charged, to wit, CHRISTOPHER NUNEZ, the defendant, while in Miami, Florida, communicated online with a 16-year-old minor in Camden County, New Jersey ("Victim-3") and convinced Victim-3 to take and transmit sexually-explicit photographs and videos of Victim-3 to NUNEZ, the defendant.

(Title 18, United States Code, Sections 2422(b) and 2427.)

FORFEITURE ALLEGATION

5. As a result of committing the offenses alleged in Counts One, Two, Three and Four of this Information, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2428, any and all property, real and personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of said offense; and any and all property, real or personal, that was used or intended to be used to commit or facilitate the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense and the following specific property:

- a) one iPhone 6s Plus with Serial #FCDSG3DZGRXC;
- b) one iPhone 11 with Serial #FK1CX7R4N72Q

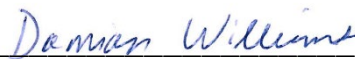
Substitute Assets Provision

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third person;
- c) has been placed beyond the jurisdiction of the Court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 2428;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

  
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DAMIAN WILLIAMS  
United States Attorney